

BARCLAY DAMON LLP

Kayla A. Arias
Associate

January 2, 2024

VIA ECF

Hon. Miroslav Lovric
United States Magistrate Judge
United States District Court, Northern District of New York
15 Henry Street
Binghamton, NY 13901

Re: M.C., et al v. Jefferson County, et al
6:22-cv-190-DNH-ML

Dear Magistrate Judge Lovric:

I write jointly on behalf of Defendants Jefferson County, et al., as well as Plaintiffs to advise that the parties have tentatively agreed to a settlement in principle.

Specifically, the parties have agreed to the terms of a Consent Decree, subject to final approval of this Court. The County of Jefferson Board of Legislators has placed a Resolution for approval of the Settlement and Consent Decree on their agenda for their annual meeting scheduled to take place later today.

As a result, the parties expect to submit a joint motion for class settlement approval within the next sixty days.

Therefore the parties respectfully request that all deadlines be stayed, pending the parties' submission of a joint motion for class settlement approval.

I have circulated this letter to Counsel for the Class, and they approve and join in this request.

Thank you for Your Honors' consideration of this request.

Respectfully Submitted,

/s/ Kayla A. Arias

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cc: All Counsel of Record **VIA ECF**